

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
Plaintiff, ) CIVIL NO. 10401-RCL  
DELIA J. BAEZ, )  
Defendant. )

## **ASSENTED-TO MOTION FOR SECOND EXTENSION**

The United States requests that this Court grant an additional extension of time within which to file its dispositive motion in the case. The court previously granted an extension until January 6, 2006. However, regrettably, the undersigned is still working to obtain information needed to present to the Court in support of the government's motion for summary judgment, namely, re-calculation of the amounts of the fraud for the purpose of ensuring that all of the amounts are accurate. She anticipates obtaining that information and filing the government's motion on or before January 16, 2005, and, accordingly requests that the deadline be extended until January 16.

Counsel for Defendant assents to this Motion.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

/s/ Anita Johnson  
ANITA JOHNSON

Assistant U.S. Attorney  
Moakley United States Courthouse  
1 Courthouse Way - Suite 9200  
Boston, MA 02210  
(617)748-3282

**Certification of Rule 7.1 Conference**

I hereby certify that on this 29<sup>th</sup> day of December 2005, I conferred with counsel for Defendant, William Keefe, and he assented to this motion.

/s/ Anita Johnson

---